MODERN SLAVERY STATEMENT
for the transition period ending December 31, 2025

Ferguson Enterprises Inc. and its subsidiaries (collectively, "Ferguson") make this statement pursuant to the UK Modern Slavery Act 2015, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023, and California's Transparency in Supply Chains Act 2010.

As previously announced in September 2025, the board of directors of Ferguson approved a change in the company's fiscal year from a fiscal year ending on July 31st of each year to a fiscal year ending on December 31st of each year. As a result of such change, there was a five-month transition period from August 1, 2025 to December 31, 2025 (the "Transition Period").

This statement describes the steps that Ferguson has taken during the Transition Period to prevent slavery and human trafficking in our global supply chain.

Ferguson's Structure and Business

Ferguson (NYSE: FERG; LSE: FERG) is North America's largest value-added distributor of essential water and air solutions, serving specialized professionals in our $340B residential and non-residential construction markets. We help make our customers' complex projects simple, successful and sustainable by providing expertise and a wide range of products and services from plumbing, HVAC, appliances, and lighting to PVF, water and wastewater solutions, and more. Headquartered in Newport News, Va., Ferguson has sales of $31.3 billion (CY'25) and approximately 35,000 associates in over 1,700 locations.

Ferguson buys products from approximately 37,000 suppliers. Approximately 95% of the products sold in the United States are sourced from U.S.-based suppliers, while approximately 90% of the products sold in Canada are sourced from Canada-based suppliers. Other countries where we principally source from include China, India, Taiwan, Thailand, Vietnam, and Italy. No supplier is larger than 5% of our total inventory purchases.

Key areas of focus in the Transition Period included (a) our ongoing commitment to compliance with applicable legal requirements that prohibit forced labor, child labor or human trafficking related activities; and (b) continuing to enhance our supplier audit capabilities which includes ethical business conduct and anti-slavery components.

Ferguson's Policies to Combat Modern Slavery

A. Our Workforce

Ferguson holds itself to high standards of business integrity and ethical conduct. Committed to extending the principles of the UN Global Compact and Universal Declaration of Human Rights to our workforce, we have adopted policies to seek to foster a respectful environment where associates have a right to freedom of association and are treated humanely and are free from harassment or discrimination in safe and secure workplaces.

These principles are embedded in our Code of Business Conduct and Ethics, which was last updated in March 2026 and applies to the Ferguson board of directors, associates and subsidiaries. It should also be followed by anyone who works on behalf of Ferguson, and Ferguson's agents, consultants and contractors.

It reflects Ferguson's commitment to ensuring that human rights are respected and encouraging our suppliers to adopt fair labor practices. Our associates, including those employed by our Asia-based sourcing subsidiaries, are trained on the Code of Business Conduct and Ethics and are encouraged to "speak up" about any situation or condition believed to violate our fundamental employee welfare standards. Our Human Rights Policy, last updated in September 2024, further exemplifies our commitment to operating in accordance with applicable legal requirements that prohibit modern slavery and human trafficking related activities. Moreover, our Internal Reporting and Anti-Retaliation Policy and Ethics Helpline offer a confidential mechanism for associates (as well as other stakeholders in our supply chain) to report (anonymously, if requested) any incidents of unfair treatment – protected from retaliation by management. During the Transition Period, no reports were received by Ferguson that involved a potential modern slavery or human trafficking incident at any Ferguson location.

Compliance with our policies is monitored via financial controls, internal audit, management oversight, security procedures and via the Ethics Helpline reporting. Corrective action for non-compliance with Ferguson policies depends on the severity of the situation and can range from counseling and training to termination of an associate's employment or an agent's, consultant's or contractor's engagement.

B. Our Supply Chain

Ferguson also holds our suppliers to standards of ethical conduct and treatment of workers. Our Supplier Code of Conduct codifies our commitment to source from ethical suppliers to ensure the products we supply are safe, reliable and manufactured by companies that share Ferguson's values of integrity and respect for the human dignity of workers. Our Supplier Code of Conduct specifically requires that any human rights violation or human trafficking is reported to Ferguson, and that suppliers provide fair working conditions, hours and compensation, and prohibit child, forced or prison labor in their operations or supply chains. Should there be a violation of our Supplier Code of Conduct, the relationship with the supplier may be terminated.

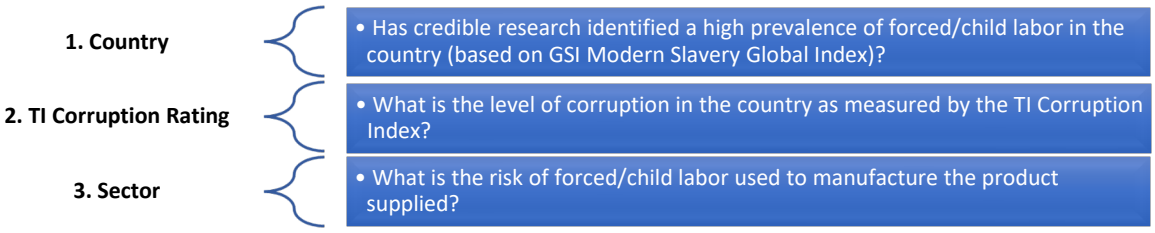
As a matter of general practice, higher risk suppliers (as determined by our Third-Party Risk Matrix described below) ("Higher Risk Suppliers") are asked to sign our Supplier Code of Conduct or we seek to incorporate the Supplier Code of Conduct clauses into supply contracts with them. By doing this, Ferguson seeks to ensure that our Higher Risk Suppliers are contractually obligated to provide fair working conditions, hours and compensation, and to prohibit child, forced or prison labor in their operations or supply chains. Among other terms, the Supplier Code of Conduct sets forth minimum standards of human rights and working conditions that are subject to on-site inspections and audits. Ferguson carries out periodic audits of Higher Risk Suppliers to verify their compliance with Ferguson's standards of product quality, safety, labor practices (including human rights: modern slavery / trafficking / forced labor) and security.

Ferguson has achieved notable success to bring Higher Risk Suppliers, including those of its regional operations, under contractual human rights commitments. Over 1,500 suppliers have contractually pledged to abstain from the use of child, forced or involuntary labor in their operations. Since launching a training program in 2025, over 500 Higher Risk Suppliers have completed Supplier Code of Conduct training. Further, most of our suppliers are not in countries with a prevalence of modern slavery according to the Global Slavery Index.

Managing the Risks of Modern Slavery in Ferguson's Global Supply Chain

Ferguson primarily sources manufactured goods from suppliers based in North America, where the risk of forced, involuntary or child labor in manufacturing activities is relatively small. While we have included our North American suppliers in our modern slavery risk analysis, effective risk management calls for focused attention on our international suppliers. We continue to deploy our risk assessment tool to help us to identify modern slavery risks in our supply chain.

Using extensive research published by human rights NGOs and the U.S. Department of Labor[1], the tool employs three criteria:



Suppliers are rated using these criteria, with the level of engagement correlated to the supplier's rating. For example, elements 1 and 2 above rate *countries* based on their risk for modern slavery or corruption and element 3 rates the *product* for risk of forced / child labor. Ferguson does not source any products that appear on the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor. Therefore, application of this tool directs engagement to Higher Risk Suppliers located in countries known to be a higher risk for corruption or slavery, such as China or India. High priority engagement generally entails a review of the supplier's employment practices, increased frequency of on-site monitoring and audits, the development of corrective action work plans (if/when needed) and capacity building activities to support the supplier's adoption of specific anti-slavery controls. Prioritization of engagement with Higher Risk Suppliers helps to ensure the effective deployment of resources in our anti-slavery compliance program.

Ongoing Due Diligence and Monitoring of Suppliers

Ferguson's Higher Risk Supplier due diligence program consists of three elements. First, corruption and adverse media screening is carried out, which includes checking for any adverse media that might link a Higher Risk Supplier to allegations of modern slavery. Second, site audits of production facilities are performed on all Higher Risk Suppliers and include a review of product quality, safety, ethical labor practices (including human rights: modern slavery / trafficking / forced labor) and security. And third, as set out above, we seek a contractual commitment to our ethical standards from our Higher Risk Suppliers. If a modern slavery incident were to be identified, Ferguson would complete additional due diligence requiring the supplier in question to complete a detailed questionnaire, provide evidence of their anti-slavery program or practices and develop a corrective action plan to be tracked for completion and impact.

Ferguson screens new and existing Higher Risk Suppliers on an ongoing monthly basis using a third-party software program for reports of modern slavery incidents (based on the level of risk, as described above).

[1] Sources relied upon in Ferguson's assessment include Country Profiles in the Global Slavery Index; U.S. Department of Labor "List of Goods Produced by Child Labor or Forced Labor"; and Transparency International's Corruption Perceptions Index.

The monthly screens help to ensure that we capture any new information that might come to light. During the Transition Period, approximately 1,360 suppliers were screened.

Ferguson also has incorporated ethics and anti-slavery elements in our supplier audit methodologies. Our Ferguson Global quality associates (based in Asia) receive ongoing audit training that includes modern slavery issues. During the Transition Period, we continued to develop the centralized auditing team's capabilities through training and practical experience, which has further illuminated our understanding of our Asia-based suppliers' operations beyond quality considerations. In addition, we are gradually expanding our audit team which includes five third-party firms on our list of our approved international compliance auditors.

Beyond on-site audits of potential new Higher Risk Suppliers, we also visit and re-audit our suppliers periodically based on risks associated with product assurance and our risk assessment tool described above. These additional touchpoints allow us to monitor our suppliers' continued commitment to our Supplier Code of Conduct.

We have a standard operating procedure for our supplier risk assessment processes and provide process communications to all sourcing associates. In addition, the modern slavery-related elements contained in our supplier audit protocols broadly cover working conditions, presence of child labor, working hours and wages, freedom of association, freedom to leave the worksite, worker retention of personal documents and the ability of workers to evacuate the building under emergency situations.

During the Transition Period, this ongoing screening process identified no red flags of modern slavery incidents involving any of the screened suppliers, and none of the Transition Period supplier audits identified any modern slavery or human trafficking risks or incidents.

Effectiveness of Ferguson's Anti-Slavery Measures and Corrective Action Approach

Our risk-based supplier due diligence and engagement is designed to ensure ongoing interaction with Higher Risk Suppliers, which should assist us in monitoring their adoption of anti-slavery controls. To date, our due diligence program assessments have not identified any modern slavery or human trafficking incidents. We assess our progress based on increases in audit capacity and results and with the increased adoption of our Supplier Code of Conduct by our Higher Risk Suppliers.

We also continue to monitor best practices as they develop in sectors relevant to our business, consulting with external stakeholders as appropriate to help strengthen our efforts. We are members of Association of Corporate Citizenship Professionals and The Conference Board. These groups provide a forum for collaboration on best practices and resources.

If confirmed cases of modern slavery or human trafficking were found within any of our contracted suppliers, we would take immediate action to notify appropriate authorities and, where appropriate, work with the supplier to understand the situation and to ensure that corrective actions were implemented to help any affected employees and to seek to prevent further harm. Unwillingness of the supplier to cooperate and implement improvements could result in termination of their contract and selection of an alternate source.

Remediation Measures

Ferguson has not taken any specific measures to remediate forced labor or child labor or to remediate the loss of income to the most vulnerable families. We will continue to evaluate potential risk areas for which remediation measures may be required.

Building Upon Our Progress

Ferguson remains steadfast in our commitment to help combat modern slavery, including evaluating new technology to enhance processes. We will continue to monitor compliance with our internal policies to help us identify and address modern slavery risks in our own business and to engage with our suppliers in an effort to identify and mitigate modern slavery risks in our supply chains. In the coming year, we will continue to request that Higher Risk Suppliers sign our Supplier Code of Conduct or seek to incorporate our Supplier Code of Conduct clauses into their contracts and will provide further modern slavery-related training to our audit teams to help ensure that modern slavery risks in our supply chain can be identified and mitigated effectively.

By working with our suppliers to identify and address any modern slavery risks, they will know that the humane treatment of their workers is just as important as the quality of goods supplied to Ferguson.

Approval and Attestation

This statement is made on behalf of all subsidiaries of Ferguson Enterprises Inc. It has been approved by the Ferguson Enterprises Inc. Board of Directors.

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I, in the capacity of President & Chief Executive Officer, attest that I have reviewed the information contained in the report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, for the reporting year listed within this report.

I have the authority to bind Ferguson Enterprises Inc. and its subsidiaries.



Kevin Murphy
President & Chief Executive Officer
May 4, 2026